

Building Blocks for Effective Housing Elements

Other Housing Element Requirements

Analysis of Consistency with General Plan Coastal Zone Requirements

Government Code Section 65300.5 states: “In construing the provisions of this article, the Legislature intends that the general plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies for the adopting agency.”

Government Code Section 65583 (c)(7) requires the identification of “means by which consistency will be achieved with other general plan elements and community goals.”

I. REQUISITE ANALYSIS

Analysis of Consistency with General Plan

The housing element affects a locality’s policies for growth and residential land uses. Among other things, the housing element establishes the locality’s housing goals, policies and objectives, identifies sites for new construction and addresses governmental constraints. The goals, policies, and objectives of an updated housing element should be reviewed in the context of the land-use, circulation, open space elements, zoning, and/or redevelopment and capital improvement plans, especially if these plans or elements have not recently been updated.

The general plan is required to be “internally consistent” meaning any and all conflicts between general plan elements should be acknowledged and resolved. Jurisdictions must ensure programs and policies in other elements do not conflict with those of the housing element; in particular the land-use, circulation or conservation elements. For example, the circulation element levels of service (LOS) standards may need to be updated to reflect potential build out capacities proposed in the housing element. Also, realistic development capacity could be impacted by the conservation element policies that require new residential projects to provide large open space corridors or buffer areas.

When conflicts exist, the housing element must describe how consistency will be achieved and how the goals of the housing element will be addressed.

Many communities attempt to address and resolve conflicts by amending the zoning ordinance and all relevant elements of the general plan concurrent with amendment of the housing element. For example, if densities of particular sites

must be increased to identify adequate sites, the attendant amendments to the general plan and zoning ordinance could be proposed and adopted at the same public hearing as the housing element.

In addition to resolving inconsistencies among various elements and/or ordinances at the time of updating the housing element, any subsequent amendment to the housing element or other general plan elements, should trigger a review of the entire general plan, especially land-use provisions, to ensure internal consistency is maintained.

Coastal Zone Requirements

Government Code Section 65588(d) requires the review of the housing element for jurisdictions located within a coastal zone to provide an additional analysis of units constructed, demolished and replaced within three miles of a coastal zones to ensure the affordable housing stock with the coastal zone is being protected and provided as required by Government Code Section 65590.

I. REQUISITE ANALYSIS

Communities located within coastal zones are required to review coastal zone affordable housing obligations including the preservation of existing occupied units affordable to low- or moderate-income households and where feasible include low- and moderate-income housing in new developments.

To assist a locality's determination of whether the affordable housing stock in the coastal zone is being protected and provided as required by Section 65590, the element must contain data on the new construction, demolition, conversion and replacements housing units for low- and moderate-income households within the coastal zone including the following:

- The number of new housing units approved for construction within the coastal zone (after January, 1982).
- The number of housing units for persons and families of low- and moderate-income required to be provided in new housing developments either within or within three miles of the coastal zone.
- The number of existing residential dwelling units occupied by low- and moderate-income households required either within or three miles of the coastal zone that have been authorized to be demolished or converted.
- The number of residential dwelling units for low- and moderate-income persons and families that have been required for replacement (of those units being demolished or converted) within or three miles of the coastal zone and designate the location of the replacement units in the housing element review for coastal zones.

Based on the analysis above, localities should consider appropriate programs to provide incentives and regulatory concessions in order to increase the feasibility of providing low- and moderate-income housing within the coastal zone.

KEY IDEAS

II. HELPFUL HINTS

UNDER CONSTRUCTION

III. MODEL ANALYSES - *UNDER CONSTRUCTION*

[General Plan Consistency - City of Chula Vista](#)

IV. LINKS

[Governor's Office of Planning and Research, General Plans Update Guidelines](#)